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Attorneys for Plaintiff
ALLSTATE INSURANCE
COMPANY

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ALLSTATE INSURANCE COMPANY, an
Illinois Corporation,

Plaintiff,

vs.

RONALD J. HAAN, CINTHIA HAAN,
STEPHEN DUKKER, SYNDACON
CORPORATION, and DOES 1 through 20,
inclusive,

Defendants.

Case No. C 05-4948 CRB

REQUEST AND [PROPOSED] ORDER
TO CONTINUE CASE MANAGEMENT
CONFERENCE; DECLARATION OF
VIRGINIA K. YOUNG

REQUEST TO CONTINUE CASE MANAGEMENT CONFERENCE

The underlying tort matter to this action has settled. Allstate and the Haans/Syndacon are currently drafting a settlement agreement for this action. Allstate respectfully requests that the Court continue the case management conference (currently scheduled for September 8, 2006) for sixty days. Counsel for the Haans/Syndacon does not object to this request. Allstate has, concurrently with this request, requested that Defendant Stephen Dukker be dismissed without prejudice from this action.

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DATED: September 5, 2006

/s/ Virginia K. Young

By: Virginia K. Young
Attorneys for ALLSTATE INS. CO.

DECLARATION OF VIRGINIA K. YOUNG

I, Virginia K. Young, declare:

1. I am an associate at Sonnenschein Nath & Rosenthal LLP, counsel for Allstate Insurance Company in the above matter. I have personal knowledge of the facts set forth herein and if called as a witness in this matter, I could and would testify competently thereto.

2. On August 31, 2006, I contacted counsel for the Haans/Syndacon, Daniel Andrist, and suggested that the parties request to continue the September 8, 2006 case management conference in this matter for 60 days while the parties prepare the settlement agreement. Mr. Andrist indicated that the Haans/Syndacon do not object to this continuance.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct and that this declaration was executed on September 5, 2006 in El Dorado Hills, California.

/s/ Virginia K. Young

Virginia K. Young

PROPOSED ORDER

Based on the foregoing, the Court hereby ORDERS that the case management conference be continued to November 17, 2006 @ 8:30 a.m.

IT IS SO ORDERED.

DATED: September 6, 2006

The Honorable Charles R. Breyer
UNITED STATES DISTRICT COURT

